

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

UNIVERSAL CIPHER, LLC,	§	
	§	
Plaintiff,	§	Case No: 2:19-cv-00163-JRG
	§	
vs.	§	LEAD CASE
	§	
TARGET CORPORATION	§	
	§	
Defendant.	§	
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UNIVERSAL CIPHER, LLC,	§	
	§	
Plaintiff,	§	Case No: 2:19-cv-00164-JRG
	§	
vs.	§	CONSOLIDATED CASE
	§	
WALMART, INC.	§	
	§	
Defendant.	§	
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**PLAINTIFF UNIVERSAL CIPHER, LLC’S ANSWER TO  
COUNTERCLAIMS OF WALMART, INC.**

Plaintiff Universal Cipher, LLC (“UC”) respectfully submits this Answer to the counterclaims asserted by Walmart, Inc. (“Walmart”) in its Answer to Plaintiff’s Complaint (“Answer”).

**WALMART, INC’S COUNTERLCLAIMS**

**PARTIES**

1. UC is without sufficient knowledge to form a belief as to the allegations set forth in paragraph 1 and, therefore, denies the same.

2. Admitted.

**NATURE OF THE ACTION**

3. Admitted.

4. UC admits that an actual controversy exists as to the infringement and validity of U.S. Patent 7, 721, 222 (the ‘222 Patent). UC admits that Walmart seeks for a declaratory judgment that the ‘222 Patent is not valid and is not infringed by Walmart. UC denies any remaining allegations in paragraph 4.

**JURISDICTION AND VENUE**

5. UC admits that jurisdiction is proper in this court. UC denies any remaining allegations in paragraph 5.

6. Admitted.

7. UC admits that venue is proper in this district. UC denies any remaining allegations in paragraph 7.

**COUNT 1**

8. UC incorporates its answers to paragraphs 1-7 herein.

9. Admitted.

10. Denied.

11. UC admits that Walmart seeks a judgment that it has not infringed and does not infringe the claims of the ‘222 Patent. UC denies any remaining allegations in paragraph 11.

**COUNT II**

12. UC incorporates its answers to paragraphs 1-11 herein.

13. Admitted.

14. Denied.

15. UC admits that Walmart seeks a declaratory judgment that the ‘222 Patent is invalid. UC denies any remaining allegations in paragraph 11.

**PRAYER FOR RELIEF**

To the extent that any response is required to the Prayer for Relief, UC denies that Defendant Walmart is entitled to judgment or any of the relief it has requested.

Dated: August 26, 2019

Respectfully submitted,

*/s/ Jay Johnson*

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on August 26, 2019.

*/s/ Jay Johnson*

**JAY JOHNSON**